

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA

IN RE ANADARKO BASIN OIL AND GAS
LEASE ANTITRUST LITIGATION

Case No. CIV-16-209-HE

**PLAINTIFFS' NOTICE OF, AND MOTION FOR, PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT AND CLASS CERTIFICATION FOR
SETTLEMENT PURPOSES**

TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD

1. PLEASE TAKE NOTICE that, on a date and at a time to be determined by the Court, at the United States District Court for the Western District of Oklahoma, 200 N.W. 4th St. Oklahoma City, OK 73102 in the Courtroom of the Honorable Chief Judge Joe Heaton, Rm 3301, Courtroom 301, Plaintiffs will, and hereby do, move the Court, pursuant to Federal Rule of Civil Procedure 23(e), for an Order to 1) appoint Settlement Class Counsel; 2) certify the proposed settlement class; 3) preliminarily approve the proposed settlement agreement; 4) approve the form and manner of providing notice of the settlement to the settlement class; (5) issue a stay of all proceedings against Defendants except those proceedings provided for or required by the settlement agreement; and (6) set a hearing date for final approval of the settlement.

2. Submitted herewith in support of Plaintiffs' Motion for Preliminary Approval of Settlement with Defendants are (i) the Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of Settlement with Defendants, (ii) the Declaration of Warren T. Burns in Support of Plaintiffs' Motion for Preliminary Approval of Settlement with Defendants the exhibits thereto, and (iii) the [Proposed] Order Preliminarily Approving Settlement.

Dated: September 5, 2018

/s/ Warren T. Burns

Warren T. Burns
Daniel H. Charest
Will Thompson
BURNS CHAREST LLP
900 Jackson Street, Suite 500
Dallas, Texas 75201
Tel: (469) 904-4550
wburns@burnscharest.com
dcharrest@burnscharest.com
wthompson@burnscharest.com

/s/ Terrell W. Oxford

Terrell W. Oxford
Shawn Raymond
SUSMAN GODFREY LLP
1000 Louisiana, Suite 5100
Houston, Texas 77002-5096
Tel: (713) 651-9366
toxford@susmangodfrey.com

William C. Carmody
Arun Subramanian
SUSMAN GODFREY LLP
560 Lexington Avenue, 5th Floor
New York, NY 1002-6828
Tel: (212) 336-8330
bcarmody@susmangodfrey.com
asubramanian@susmangodfrey.com

/s/ Christopher J. Cormier

Christopher J. Cormier
COHEN MILSTEIN SELLERS &
TOLL, PLLC
5290 Denver Tech Center Parkway
Greenwood Village, Colorado 80111
Tel: (720) 630-2092
ccormier@cohenmilstein.com

Richard A. Koffman
Robert W. Cobbs
COHEN MILSTEIN SELLERS &
TOLL, PLLC
1100 New York Avenue, NW, Suite 500
Washington, D.C. 20005 Tel: (202) 408-
4600
rkoffman@cohenmilstein.com
rcobbs@cohenmilstein.com

/s/ Todd M. Schneider

Todd M. Schneider
Jason Kim
Kyle G. Bates
SCHNEIDER WALLACE COTTRELL
KONECKY WOTKYNS, LLP
2000 Powell Street, Suite 1400
Emeryville, California 94608
Tel: (415) 421-7100
TSchneider@schneiderwallace.com
jkim@schneiderwallace.com
kbates@schneiderwallace.com

Interim Co-Lead Counsel for the Proposed Class

/s/ Larry D. Lahman

Larry D. Lahman
Michael E. Kelly
Carol Hambrick Lahman
MITCHELL DECLERCK
202 West Broadway Avenue
Enid, Oklahoma 73701
Tel: (800) 287-5144
Fax: (580) 234-8890

Interim Liason Counsel for the Proposed Class

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document was duly served electronically on all known counsel of record through the Court's Electronic Filing System on September 5, 2018.

By: /s/ Warren Burns
Warren Burns

CERTIFICATE OF CONFERENCE

This is to certify that counsel of record conferred via e-mail and phone conference on June 28, 2018, and August 24-30, 2018 regarding this motion.

By: /s/ Warren Burns
Warren Burns